The Dow Chemical Company Midland, Michigan 48674

2030 DOW CENTER November 26, 1997

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Document Processing Center (TS-790)
Office of Toxic Substances
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

Washington, D.C. 20460 Attn: 8(e) Coordinator

Re:

Research Compound which may be referred to generically as a Halogenated Alkylated Substituted Pyridine.

Dear Sir/Madam:

The following information is being submitted by The Dow Chemical Company (Dow) pursuant to current guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substance Control Act. Dow has made no determination as to whether a significant risk of injury to health or the environment is actually presented by the findings.

In three separate 13-week rodent toxicity studies, the following results were observed:

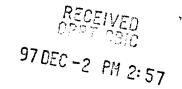
A. Groups of 10 Fischer 344 rats/sex/dose were given feed containing 0, 0.3, 1.0, 10, 50 or 150 mg/kg/day for 13 weeks. Uterine weights from rats given 50 or 150 mg/kg/day were lower than the controls and were statistically identified. Body and ovarian weights of these rats were comparable to the controls, however, liver weights of rats given 10, 50 or 150 mg/kg/day were heavier than the controls and statistically identified. Preliminary histopathologic evaluation of the reproductive tract of female rats indicated that there were no pathologic abnormalities in any of the reproductive tissues. Treatment-related histologic liver effects have been observed in female rats given 10, 50 or 150 mg/kg/day

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and kidney effects occurred in female rats given 150 mg/kg/day.

- B. Groups of 10 CD-1 mice/sex/dose were given feed containing 0, 0.3, 1.0, 10, 50 or 350 (females only) and 300 (males only) mg/kg/day for 13 weeks. Uterine weights of mice given 350 mg/kg/day were lower than the controls and were statistically identified. Body and ovarian weights of these mice were comparable to the controls, however, liver weights of mice given 10, 50 or 350 mg/kg/day were heavier than the controls and statistically identified.
- C. Groups of 10 Sprague-Dawley rats/sex/dose were given feed containing 0, 10, 100 or 250 mg/kg/day. Uterine weights from rats given 250 mg/kg/day were lower than the controls and were statistically identified. Ovarian weights of these rats were comparable to the controls, however, the body weights of female rats given 100 or 250 mg/kg/day were decreased and statistically identified, whereas the liver weights of female rats given 100 or 250 mg/kg/day were increased and statistically identified.

Lower uterine weights occurred only at dose levels that caused significant increases in liver weight in all three studies and a significant decrement in body weight in Sprague-Dawley rat study. In addition, increased liver weights were also seen at a lower dose level, not associated with decreased uterine weights.

No written report of these studies is yet available. The test material is being investigated for possible use as a

Sincerely,

Paul A. Wright

Counsel

Legal Department

517/636-1853